

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, et al.,

Defendants.

**Civil Action No. 3: 17-cv-00072-NKM**

**PLAINTIFFS' MOTION TO SEAL SELECT EXHIBITS TO PLAINTIFFS' MOTION  
FOR DIRECT ACCESS TO CERTAIN DISCOVERY OF DEFENDANT VANGUARD  
AMERICA**

On February 12, 2020, Plaintiffs filed a Motion for Direct Access to Certain Discovery of Defendant Vanguard America ("Plaintiffs' Motion"). For the reasons set forth below, Plaintiffs respectfully request that the Court enter the proposed order sealing Exhibit 3 to Plaintiffs' Motion, which was submitted conditionally under seal today in this matter.

Exhibit 2 to Plaintiffs' Motion was designated as Confidential by Plaintiffs pursuant to the Order for the Production of Documents and Exchange of Confidential Information on January 3, 2018 (ECF No. 167, the "Protective Order"). Additionally, Exhibit 3 contains Confidential information as defined by the terms of the Protective Order. For the reasons set forth herein, Plaintiffs request that Exhibit 3 to Plaintiffs' Motion be sealed in accordance with Local Rule 9.

Dated: February 12, 2020

Respectfully submitted,

/s/ Alan Levine

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### CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2020 I filed the foregoing with the Clerk of the Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further certify that on February 12, 2020 I served the foregoing upon following *pro se* defendants, via electronic mail, as follows:

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